



FEDERAL ELECTION COMMISSION

Washington, D.C. 20002

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Kathleen M. Guith
Associate General Counsel for Enforcement

BY: Mark D. Shonkwiler *MS*
Assistant General Counsel

Christopher Edwards *CLE*
Attorney

SUBJECT: MUR 7122 (APIC, et al.) – Pre-Probable Cause Conciliation Agreement

On March 29, 2017, the Commission found reason to believe that American Pacific International Capital, Inc. ("APIC"), Gordon Tang, Huaidan Chen, and Wilson Chen violated 52 U.S.C. § 30121(a)(1)(A) as a result of foreign national participation in APIC's two contributions, totaling \$1.3 million, to Right to Rise USA.¹ After an investigation, the Commission authorized pre-probable cause conciliation and approved a conciliation agreement with an opening settlement offer of ² Attached is a negotiated conciliation agreement that has been signed by Wilson Chen, Executive Director of APIC.³ We recommend that the Commission accept this agreement and close the file in this matter.

¹ Certification, MUR 7122 (Mar. 30, 2017).

² Certification, MUR 7122 (Aug. 9, 2018).

³ Attach. I.

Thus, we

recommend that the Commission accept the negotiated conciliation agreement and close the file as to these Respondents.⁸

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with American Pacific International Capital, Inc. ("APIC"), Gordon Tang, Huaidan Chen, and Wilson Chen;

- 1 2. Close the file as to American Pacific International Capital, Inc. ("APIC"), Gordon
- 2 Tang, Huaidan Chen, and Wilson Chen; and
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- 4 3. Approve the appropriate letter.
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